

EXHIBIT 4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RICHARD XIA, et al.,

Defendants,

and

JULIA YUE and XI VERFENSTEIN, et al.,

Relief Defendants.

Case No.: 21-cv-5350 (PKC)(RER)

STATE OF NEW YORK)
) ss.
COUNTY OF QUEENS)

**AFFIDAVIT OF RICHARD XIA ON BEHALF OF FLEET NEW YORK
METROPOLITAN REGIONAL CENTER, LLC**

I, **Richard Xia**, submit this affidavit on behalf of Fleet New York Metropolitan Regional Center, LLC (“Fleet Regional Center”), in response to this Court’s November 29, 2023 Order (The “November 2023 Order”) relating to the above-captioned action:

1. Fleet Regional Center is a Defendant in the above-captioned matter.
2. Fleet Regional Center has maintained all responsive documents and communications at the following:

location(s): 4231 Union Street, Flushing

file(s): N/A

computer(s): IMAC computer (year unknown)

mobile device(s): multiple iPhones/versions 9-13

email address(es): Richard.y.xia@fleetfinancialgroup.com, Richard.y.xia@Fnymrc.com

server(s): N/A

3. Fleet Regional Center has preserved all responsive documents and communications at the locations/files/computers/mobile devices/email addresses identified in #2 above, where such documents have been maintained. In order to preserve the referenced documents, no documents were deleted.

4. Fleet Regional Center has conducted searches for responsive documents and communications in the following manner:


- In 2018, Fleet Regional Center gave all its emails to KL Discovery to capture all company emails. Richard Xia, then instructed Fleet's lawyers at Greenberg Traurig to run searches for all responsive non-privileged documents.
- In 2019 and 2023, Richard Xia, searched for responsive documents by searching his computer, phone, and hard-copy files, using the key words or key terms from each request made of him.

5. Fleet Regional Center conducted searches for responsive documents by:

Same answer as Number 4 above.

6. All responsive documents are still in the possession of Fleet Regional Center.

7. Richard Xia undertook the efforts to search for all responsive documents and communications.


Richard Xia
Dated: December 20, 2023

Sworn to and Subscribed before me
this 20 day of DECEMBER, 2023


NOTARY PUBLIC

My Commission Expires: 02/02/2027

